UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

UNITED STATES OF AMERICA	§		
Plaintiff,	§		
	§		
v.	§	Criminal No.	B:25-CR-257-S2
	§		
JAMES LAEL JENSEN	§		
MAXWELL STERLING JENSEN	§		
a/k/a "Max"	§		
Defendants	§		

SUPPLEMENTAL NOTICE OF FORFEITURE TO SECOND SUPERSEDING INDICTMENT

On October 28, 2025, a Second Superseding Indictment issued, which charged the above-named defendants with violations of Title 18, including conspiracy to money launder; smuggling goods into the United States; entry of goods into the United States by means of false statements; conspiracy and engaging in monetary transactions with criminally derived proceeds in excess of \$10,000; and conspiracy to provide material support to a foreign terrorist organization. The Second Superseding Indictment included a Notice of Forfeiture for each count of the indictment.

This Notice serves as a supplement and correction to the numbered counts of the indictment and referenced statutory authority for forfeiture as follows:

- Notice of Forfeiture as to Counts One through Five and Nine is given pursuant to 18 U.S.C. § 982(a)(1);
- Notice of Forfeiture as to Counts Six and Seven is given pursuant to 18 U.S.C. § 982(a)(2)(B); 19 U.S.C. § 1595a; and 28 U.S.C. § 2461(c);
- Notice of Forfeiture as to Counts Eight and Ten is given pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

The United States further supplements the property identified for forfeiture in the Notice of Forfeiture in the Second Superseding Indictment to include a 2023 yellow Chevrolet Corvette with VIN # 1G1YB3D43P5118657.

Respectfully submitted,

NICOLAS J. GANJEI United States Attorney

BY:

s/ Mary Ellen Smyth
Mary Ellen Smyth
Assistant United States Attorney

CERTIFICATE OF SERVICE

On this the 16th day of December 2025, the foregoing Supplement to Notice of Forfeiture in Second Superseding Indictment was served via electronic case filing to all defendants who have appeared of record in person and through their respective attorneys.

<u>s/Mary Ellen Smyth</u>

Mary Ellen Smyth

Assistant United States Attorney